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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA, Plaintiff, vs. RICHARD SCOTT NEMROW, Defendant.	REQUEST FOR DISCOVERY Case No. 2:22-cr-00481-CW Judge Clark Waddoups Magistrate Judge Dustin B. Pead
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COMES NOW Defendant, RICHARD SCOTT NEMROW, by and through counsel, Adam L Crayk, Douglas L. Stowell, S. Todd Banks, Craig Stanger and Jeremy Deus, pursuant to Rule 16 of the Utah Rules of Criminal Procedure, and serves upon the United States of America the foregoing Request for Discovery for production of the following items and documents:

REQUEST NO. 1: A list of all names and addresses of witnesses that the United States of America (hereafter the “USA”) intends to call for trial in the above-entitled matter.

REQUEST NO. 2: Copies of any recordings, police reports, transcripts and/or reports regarding statements of any witnesses, victims or other parties in this matter, in the possession of any person, group or entity involved in investigation and or prosecution of this matter.

REQUEST NO. 3: Copies of any and all forms, citations, notes, logs, either written or recorded in some other fashion, involved in any way in this matter.

REQUEST NO. 4: Copies of any and all criminal records of Defendant.

REQUEST NO. 5: Copies of any and all criminal records of any and all witnesses and/or victims in this matter.

REQUEST NO. 6: A list of all physical evidence, which the USA has seized from Defendant in this matter, and a list of all physical evidence the USA intends to use at trial. In your answer, include the location of said evidence and in what manner and at what time said evidence can be inspected by counsel.

REQUEST NO. 7: Copies of any reports or conclusions of any expert witnesses which the USA has prepared in this case.

REQUEST NO. 8: Copies of any charts, diagrams, maps or photographs or other demonstrative evidence prepared by the USA or any affiliates or investigatory agencies used by the USA.

REQUEST NO. 9: Copies of any statements made by Defendant to any person or organization, which are in the USA's possession. In your answer, include the nature of the statement or interview, the purpose behind obtaining the statement, the date and time the statement was made, the place the statement was made, and the persons present when said statements were made.

REQUEST NO. 10: Identify and list any and all evidence known to the USA that may

negate or mitigate the guilt of Defendant.

REQUEST NO. 11: Provide a list of exhibits the USA intends to introduce in a trial of this matter.

REQUEST NO. 12: Provide a copy of any and all dispatch records and tape records relating in any way to this matter.

REQUEST NO. 13: All non-protected documents and written information contained in employee files of the arresting officer(s) in the above-entitled matter, including, but not limited to, documents relating to the arresting officer's advancements and demotions while in the employ of any and all law enforcement agencies, if any, documents relating to work experience, and documents relating to the arresting officer's personal driving history.

DATED this 4th day of January, 2023.

/s/ Adam L Crayk
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of January, 2023, I electronically filed Defendant's **REQUEST FOR DISCOVERY** with the clerk of the Court and opposing counsel using the ECF System.

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/s/ Lisa Freebairn _____